

RECEIVED

NOV 07 2022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

BY MAIL Eastern DIVISION

Dillon Gier John Majors
D.O.C #1277817

(Write the full name of the plaintiff in this action.
Include prisoner registration number.)

Case No: _____
(to be assigned by Clerk of District Court)

v.

Plaintiff Requests Trial by Jury

Jason Lewis, Paul Blair, Brian
Davis, Ryan Since, Jeremiah
Richardson, Kenneth Boyer, Brian
Pickett, Benjamin Barbier

☒ Yes ☐ No

(Write the full name of each defendant. The caption
must include the names of **all** of the parties.
Fed. R. Civ. P. 10(a). Merely listing one party and
writing "et al." is insufficient. Attach additional
sheets if necessary.)

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff should not send exhibits, affidavits, witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed without prepayment of fees and costs.

I. The Parties to this Complaint

A. The Plaintiff

Name: DILLONGER John Majors

Other names you have used: N/A

Prisoner Registration Number: 1277817

Current Institution:

Potosi Correctional Center

Indicate your prisoner status:

<input type="checkbox"/> Pretrial detainee	<input checked="" type="checkbox"/> Convicted and sentenced state prisoner
<input type="checkbox"/> Civilly committed detainee	<input type="checkbox"/> Convicted and sentenced federal prisoner
<input type="checkbox"/> Immigration detainee	<input type="checkbox"/> Other (explain): _____

B. The Defendant(s)

To the best of your knowledge, give the information below for each defendant named in the caption of this complaint. Make sure the defendant(s) named below are the same as those listed in the caption of this complaint. Attach additional pages if necessary.

For an individual defendant, include the person's job title, and check whether you are suing the individual in his or her individual capacity, official capacity, or both.

Defendant 1

Name: Jason Lewis

Job or Title: Deputy Division Director

Badge/Shield Number: N/A

Employer: MoDOC - Central Office

Address: 2729 Plaza Dr. P.O. Box 236 Jeff. City, Mo 65102

X Individual Capacity X Official Capacity

I. The Parties to this Complaint

B. Defendants

Defendant 3

Name: Ryan Since

Job or Title: Major

Badge/Shield Number: UNKNOWN

Employer: MoDOC-Potosi Correctional Center

Address: 11593 State Hwy 0; Mineral Point, Mo 63660

☒ Individual Capacity ☒ Official Capacity

Defendant 4

Name: Brian Davis

Job or Title: Functional Unit Manager

Badge/Shield Number: UNKNOWN

Employer: MoDOC-Potosi Correctional Center

Address: 11593 State Hwy 0; Mineral Point, Mo 63660

☒ Individual Capacity ☒ Official Capacity

Defendant 5

Name: Jeremiah Richardson

Job or Title: Lieutenant

Badge/Shield Number: UNKNOWN

Employer: MoDOC-Potosi Correctional Center

Address: 11593 State Hwy 0; Mineral Point, Mo 63660

☒ Individual Capacity ☒ Official Capacity

Defendant 6

Name: Brian Pickett

Job or Title: At Time of Incident Sergeant

Badge/Shield Number: E0144174

Employer: MoDOC - Potosi Correctional Center

Address: 11593 State Hwy 0; Mineral Point, Mo 63660

☒ Individual Capacity ☒ Official Capacity

Defendant 7

Name: Kenneth Boyer

Job or Title: No longer works for D.O.C

Badge/Shield Number: N/A

Employer: UNKNOWN

Address: UNKNOWN

☒ Individual Capacity ☒ Official Capacity

Defendant 8

Name: Benjamin Barbier

Job or Title: No longer works for D.O.C

Badge/Shield Number: N/A

Employer: UNKNOWN

Address: UNKNOWN

☒ Individual Capacity ☒ Official Capacity

I Declare UNDER Penalty of Perjury that the foregoing is True and correct.

Signed this 25th Day of October, 2022.
Signature of Plaintiff: Dillinger J. Major

Defendant 2

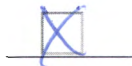
Name: Paul Blair

Job or Title: WARDEN (Retired)

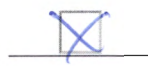
Badge/Shield Number: N/A

Employer: N/A

Address: UNKNOWN



Individual Capacity



Official Capacity

II. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

See Attachment

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DILLONGER MAJORS #1277817
Plaintiffs

v.

JASON LEWIS, PAUL BLAIR, RYAN BINEE,
BRIAN DAVIS, JEREMIAH RICHARDSON,
KENNETH BOYER, BRIAN PICKETT, BENJAMIN
BARBIER

Defendants

Case No: _____

Plaintiff Request Trial By Jury
☒ YES ☐ NO

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(PRISONER COMPLAINT)

PARTIES, JURISDICTION, AND VENUE

- 1) At all Times Relevant Herein, Plaintiff DILLONGER Majors ("Plaintiff" or "Majors") was and continues to be a citizen of The United States.
- 2) At all Times Relevant Herein, Plaintiff was an inmate in the care, custody and control of The Missouri Department of Corrections.
- 3) At all Times Relevant Herein, Plaintiff was an inmate at The Potosi Correctional Center where The alleged violations occurred.
- 4) The Potosi Correctional Center is located in Mineral Point, Missouri, within The jurisdictional Boundaries of This Court.
- 5) At all Times Relevant Herein, Jason Lewis (Deputy Division Director) of The Missouri Department of Corrections was and is a part of The Political Subdivision of The State of Missouri and is in control of The entity, which operates The Potosi

Correctional Center, who are Responsible for The Training and Supervisions of That Institutions Staff.

- 6) At all Times Relevant Herein, Defendants Paul Blair, Major Ryan Since, Lieutenant Jeremiah Richardson, Sergeant Kenneth Boyer, Sergeant Brian Pickett, Sergeant Benjamin Barbier, and Functional Unit Manager Brian Davis were employed By The Deputy Division Director Jason Lewis of The Missouri Department of Corrections, in it's Potosi Correctional Center Facility, which was Responsible for Training and Supervising The Defendants at all Relevant Herein.
- 7) At all Times Relevant Herein, Defendants Paul Blair, Ryan Since, Jeremiah Richardson, Kenneth Boyer, Brian Pickett, Benjamin Barbier, Brian Davis, and Jason Lewis acted under The color of ~~the~~ law, statutes, ordinances, Regulations, Policies, Customs, Practices, and usages of The United States, The State of Missouri, and The Missouri Department of Corrections and Pursuant To Their authority as law enforcement staff.
- 8) This action arises under The United States Constitution and 42 U.S.C § 1983
- 9) This court Has Jurisdiction under and By virtue of 28 U.S.C § 1331 and 1367.
- 10) Vence is Founded in This judicial court upon 28 U.S.C § 1391, as The acts complained of arose in

This District and upon information and belief at the time this action was initially filed, the parties resided in this judicial District.

11. Plaintiff demands a trial by jury pursuant to Fed. R. Civ. P. 38(b).

FACTS COMMON TO ALL COUNTS

12) ON March 15, 2022 around 10:45 p.m. I/Plaintiff was in
 13) Housing Unit 1-B wing cell #20. I was involved
 14) in a 7 man cell extraction team. When the door opened
 15) I noticed Kenneth Bayer was the first person that
 16) had the shield and Benjamin Barbier was number 2
 17) once they entered the cell Kenneth Bayer dropped the
 18) shield and immediately began striking me in the face
 19) with a closed fist as they forced me to the back
 20) of the cell. I then covered my face with my arms
 21) and turned my back to them to avoid the
 22) excessive force of being assaulted in the face. One
 23) of the officers grabbed me around the neck and
 24) slammed me to the ground. While on the ground
 25) I was able to discern that Kenneth Bayer and
 26) Benjamin Barbier began striking me with closed
 27) fists again while I was being compliant with
 28) them placing me in full restraints. Once I was
 29) fully restrained Benjamin Barbier continued
 30) with his assault and me by my head and began
 31) slamming my face into the concrete, breaking a tooth.

32) AND chipping another one, breaking my nose, AND
33) swelling my left eye shut. Once I was out of the cell
34) I was choking on the blood from my nose and
35) saliva. I proceeded to clear my throat AND spit
36) the blood AND saliva to the right because there
37) was a C.O. in the way to my left. When I spit
38) towards the ground to my right, Kenneth
39) Boyer who was standing to my right alleged
40) that some got on his face AND used that as
41) manipulation to assault me once again by striking
42) me in the face twice causing more damage to my
43) nose. Then I was escorted to medical where
44) the nurse cleaned all the blood off my face. I was
45) then taken back to my cell where Benjamin
46) Barbier came & took pictures of my face. I was
47) placed on limited property where I was deprived
48) soap, toothpaste, toothbrush, toilet paper, pen, paper,
49) envelopes AND stamps for 2 weeks, while I was
50) in the process of going to court on criminal charges

COUNT I

CRUEL AND UNUSUAL PUNISHMENT, EXCESSIVE FORCE,
DELIBERATE INDIFFERENCE

51) Plaintiff hereby incorporates by reference each and
 52) every allegation and averment set forth in Paragraphs
 53) one (1) through Fifty (50) of this complaint as if fully
 54) set forth herein.

55) While in the custody of Defendants, Plaintiff was
 56) subjected to excessive force. Defendants knew that
 57) they were subjecting Plaintiff to excessive force and
 58) failed to ~~prevent~~ adequately prevent cruel and unusual
 59) punishment when they repeatedly assaulted Plaintiff.
 60) As a direct and proximate result of the Defendants
 61) actions and inactions Plaintiff was caused to suffer
 62) serious bodily injuries, including but not limited to
 63) bruising, wounds, broken teeth, physical pain and
 64) suffering, and emotional pain and suffering.

65) Defendants actions were taken under color of state law
 66) through their actions and omissions, Defendants
 67) knowingly and deliberately indifferent to Plaintiff's
 68) rights, subjected Plaintiff to a violation of cruel
 69) and unusual punishment by excessive force. These actions
 70) and omissions caused substantial harm to Plaintiff.

71) There exist within the Missouri Department of Corrections
 72) policies or customs, practices and usages of deliberate
 73) indifference that are so pervasive that they constitute
 74) the policies of the Defendants, Plaintiff was deprived
 75) of his rights secured to him by the Eighth Amendment
 76) of the Constitution of the United States and the

77) Law enacted thereunder. Defendants conduct was
78) cruel and unusual punishment to Plaintiff using
79) excessive force.

80) Therefore, Defendants are liable to Plaintiff pursuant
81) to 42 U.S.C. Section 1983.

82) Wherefore, Plaintiff prays for judgment against each
83) and every named Defendant for compensatory
84) damages in an amount that is fair and reasonable
85) for physical injuries and emotional pain and suffering
86) \$100,000 from each Defendant separately for
87) punitive damages, plus the cost of the suit of this
88) action: I also want all Parties fired and
89) demoted, and for such other and further relief as
90) the court deems fair and appropriate under the
91) circumstances.

COURT II

ASSAULT AND BATTERY

92) Plaintiff hereby incorporates By Reference each and every
93) allegation and averment set forth in paragraphs
94) one (1) through ninety-one (91) of This complaint as if
95) fully set forth therein.

96) While in the custody of Defendants, Plaintiff was
97) subjected to Assault and Battery. Defendants knew
98) that they were subjecting Plaintiff to Assault and
99) Battery and fail to adequately prevent the Assault and
100) Battery when they repeatedly assaulted Plaintiff
101) as a direct and proximate result of the Defendant
102) actions and inactions Plaintiff was caused to suffer
103) serious bodily injuries, including but not limited to Broken
104) nose, Broken Tooth, Swollen eye, Bruising, wounds, physical pain
105) and suffering, and emotional pain and suffering.

106) As a direct and proximate cause of the Defendants actions and
107) alleged herein Plaintiff has suffered and will continue
108) to suffer physical pain and suffering, and emotional pain and
109) suffering.

110) Defendants actions were taken under color of state law.
111) through their actions and omissions Defendants knowingly
112) and Deliberately indifferent to Plaintiff's Rights, ~~and~~
113) subjected Plaintiff to a violation of cruel and unusual
114) punishment Assault and Battery. These actions and omissions
115) caused substantial harm to Plaintiff.

116) There exist within the Missouri Department of Corrections
117) policies or customs, practices and usages of deliberate
118) indifference that are so pervasive that they constitute the

119) policies of the Defendants that caused the constitutional
 120) deprivations of Plaintiff set forth herein.

121) By Reason of the conduct of Defendants, Plaintiff was
 122) Deprived of His Rights Secured to Him By the Eighth
 123) Amendment of the Constitution of the United States and the
 124) Law enacted Thereunder. Defendants conduct was cruel and
 125) unusual punishment to the Plaintiff inflicting assault and
 126) battery. Therefore Defendants are liable to Plaintiff pursuant
 127) to 42 U.S.C section 1983.

128) Wherefore, Plaintiff prays for judgement against each
 129) and every named Defendant for compensatory Damages
 130) in an amount that is fair and Reasonable for physical
 131) injuries and emotional pain and suffering; \$100,000
 132) from each Defendant separately for punitive Damages
 133) plus the cost of the suit of this action. I also want
 134) all parties fired and removed, and for such other
 135) and further Relief as the court Deems fair and
 136) appropriate under the circumstances.

Failure To Instruct, Train, Supervise, AND/OR Control Against
Defendants

Missouri Department of Corrections Cognizable under 42
U.S.C § 1983

137) Plaintiff Hereby incorporates By Reference each and every
138) allegation and Government set forth in paragraphs one (1)
139) through one-hundred and thirty-six (136) of this complaint and
140) is fully set forth herein.

141) Defendants Jason Lewis, Paul Blair, Ryan Since, Brian
142) Davis, Jeremiah Richardson, Brian Pickett violated the
143) constitutional rights of Plaintiff By subjecting Plaintiff
144) to cruel and unusual punishment as set forth in Count I
145) and Count II.

146) There exist within the Missouri Department of Corrections
147) policies or customs, practices, and usages that are so
148) pervasive that they constitute the policies of the ~~corrections~~
149) Defendants that caused the constitutional deprivation
150) of Plaintiff set forth herein. The Policies, customs, practices,
151) and usages that exist are:

- 152) a) To strike inmates in the face with a closed fist
- 153) b) Grabbing inmates By the neck and choke slamming them
- 154) to the ground
- 155) c) Grabbing inmates By the head and slamming their face
- 156) into the concrete
- 157) d) Breaking inmates Teeth By slamming their face into the
- 158) concrete
- 159) e) Chipping inmates Teeth By slamming their face into the
- 160) concrete

(161) F) SLAMMING inmates face into the concrete Breaking their nose
 (162) G) Punching inmates in the face swelling their eye shut
 (163) H) Punching inmates in the mouth causing their lips to bleed
 (164) I) To allow staff to use excessive force on inmates
 (165) J) To allow staff to use Assault and Battery on inmates
 (166) K) To fail to adequately train, supervise, and/or control
 (167) Correctional officers concerning the practices aforementioned to
 (168) assure compliance with state and federal laws, and the
 (169) Constitution of the United States, including but not limited
 (170) to failing to train correctional officers on the proper
 (171) procedures to employ when inmates (a) are in a crisis; (b)
 (172) refusing to comply and submit to restraints; (c) and the
 (173) movement team is activated. Alternatively, and without
 (174) waiver of the foregoing, Defendants Training Program
 (175) was not adequate to train its officers to properly restrain
 (176) inmates during a crisis like the situation involving the
 (177) Plaintiff and, therefore, the Defendants had a policy or
 (178) custom of failing to adequately train employees of the
 (179) Missouri Department of Corrections, in this case, particular
 (180) Potosi Correctional Center. The Defendants know that
 (181) more and/or different training was needed to avoid the
 (182) acts and/or omissions of Defendants as described
 (183) herein, or the need for such training was obvious to the staff
 (184) at Potosi Correctional Center.
 (185) The Defendants are vested with the duty, power, and
 (186) authority to train, supervise, and otherwise control the
 (187) Correctional officers at Potosi Correctional Center.

188) These Defendants have failed in it's duty to so train
189) and supervise the Correctional Officers responsible for
190) Plaintiff's injuries as described herein, generally and
191) specifically, so as to conform their conduct with
192) constitutional requirements.

193) The failure of Defendants at Potosi Correctional Center
194) as alleged herein caused the Constitutional Deprivation
195) that was suffered by Plaintiff as set forth in Count I
196) and Count II.

197) The acts of the Defendants as set forth herein were
198) taken under color of State law.

199) As a direct and proximate result of the actions of the
200) Defendants as alleged herein, Plaintiff was caused
201) to sustain injuries and damages, which include, but
202) were not necessarily limited to, Bodily injuries, bruising,
203) wounds, physical pain and suffering, and emotional pain
204) and suffering.

205) The acts of Defendants at Potosi Correctional Center
206) as set forth herein involved a reckless or callous
207) indifference to the federally protected rights of the
208) Plaintiff, making an award of Punitive Damages
209) appropriate in this case to Deter it and others from
210) similar conduct in the future.

COUNT III

14th Amendment Due Process

211) Plaintiff HereBy incorporates By Reference each and every
 212) allegation and Overment set forth in paragraphs one(1)
 213) through Two Hundred and Ten(210) of this complaint as if
 214) fully set forth herein.
 215) While in the custody of Defendants Jason Lewis, Paul
 216) Blair, and Brian Davis Plaintiff was Deprived of His
 217) Fourteenth amendment Right to Due Process. Defendants
 218) knew that Plaintiff was Getting Deprived of His Due
 219) Process Right. Plaintiff filed an I.R.R. March 24th, 2022
 220) and should've Got a Response By May 3rd, 2022 But
 221) Didn't Get a Response until May 18th, 2022, which forced
 222) Plaintiff to have to file His Grievance May 18th, 2022 and
 223) Didn't Get His Response until July 11th, 2022. On July
 224) 11th, 2022 Plaintiff filed Grievance Appeal and Didn't
 225) Get a Response until October 11th, 2022. Defendants
 226) Have a total of 180 Days to Process the I.R.R., Grievance,
 227) and Grievance Appeal. Defendants took a total of 201
 228) Days to Process the I.R.R., Grievance, Grievance Appeal.
 229) Defendants are 21 Days past there Deadline, which
 230) put the Defendants in violation of Plaintiff's 14th
 231) Amendment Due Process Rights.
 232) Defendants actions were taken under color of State Law.
 233) Through Defendants actions and omissions. Defendants
 234) knowingly and Deliberately indifferent to Plaintiff's Right
 235) subjected Plaintiff to a violation of His constitutional
 236) Rights to Due Process.
 237) There exist with the Missouri Department of Corrections

238) policies or customs, practices and usages of Deliberate
239) Indifference that are so pervasive that they constituted
240) the Policies of the Defendants that caused the
241) Constitutional Deprivations of the Plaintiff set forth herein
242) By Reason of the conduct of Defendants, Plaintiff was
243) Deprived of His Rights secured to him by the fourteenth
244) amendment of the Constitution of the United States and
245) the laws enacted thereunder, Defendants conduct was
246) Deliberately Indifferent to Plaintiff's Right to Due
247) Process. Therefore, Defendants are liable to Plaintiff
248) pursuant to 42 U.S.C section 1983.

249) Wherefore, Plaintiff pray for judgement against each
250) and every named Defendant \$100,000 from each
251) Defendant separately for Punitive Damages plus the
252) cost of the suit of this action. I also want all parties
253) Fired, Demoted, and stripped of Retirement Benefits,
254) and for such other and further Relief as the court
255) Deems fair and appropriate under the circumstances.

III. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I Sustained a Broken Nose, which needed medical treatment but was almost healed by the time I was seen. I Sustained Two (2) Broken Teeth for which there is no treatment other than removing them. I Sustained a Swollen Shot eye (left) which had to heal on its own.

IV. Relief

State briefly and precisely what you want the Court to do for you. Do not make legal arguments. Do not cite any cases or statutes. If you are requesting money damages, include the amounts of any actual damages and/or punitive damages you are claiming. Explain why you believe you are entitled to recover those damages.

I want all Parties fined w/o Retirement Benefits, I want \$100,000 per individual involved. I believe I'm entitled to Recover Those Damages Because I suffer from Migraines, Tooth pain, Harder to Breathe Due to nose healing crooked, & the mental and emotional anguish, & fear of further Retaliation.

V. Exhaustion of Administrative Remedies/Administrative Procedures

The Prison Litigation Reform Act ("PLRA") 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?



Yes



No

If yes, name the jail, prison or other correctional facility where you were confined at the time of the events giving rise to your claim(s):

Potosi Correctional Center

- B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?



Yes



No



Do not know

- C. If yes, does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claims?



Yes



No



Do not know

If yes, which claim(s)?

N/A

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?



Yes



No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?



Yes



No

- E. If you did file a grievance:

1. Where did you file the grievance?

Potosi Correctional Center

2. What did you claim in your grievance? (Attach a copy of your grievance, if available)

Excessive Force
(See Attachments)

3. What was the result, if any? (Attach a copy of any written response to your grievance, if available)

Denied
(See Attachments)

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

I filed an Informal Resolution Request, which Got Denied. I appealed it with the Grievance which was Denied. I appealed that with the Grievance Appeal which was Denied also. Thus, the Grievance process is completed.

- F. If you did not file a grievance:

N/A

1. If there are any reasons why you did not file a grievance, state them here:

N/A

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

N/A

- G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VI. Previous Lawsuits

The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has “on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. § 1915(g).

- A. To the best of your knowledge, have you ever had a case dismissed on the basis of this “three strikes rule”?

☐ Yes ☒ No

If yes, state which court dismissed your case and when it was dismissed. Attach a copy of the court’s order, if possible.

N/A

Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes ☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff N/A

Defendant(s) N/A

2. Court (if federal court, name the district; if state court, name the state and county)

N/A

3. Docket or case number N/A

4. Name of Judge assigned to your case N/A

5. Approximate date of filing lawsuit N/A

6. Is the case still pending?

☐ Yes

☐ No (If no, give the approximate date of disposition): N/A

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

N/A

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes

☒ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff N/A

Defendant(s) N/A

2. Court (if federal court, name the district; if state court, name the state and county)

N/A

3. Docket or case number N/A

4. Name of Judge assigned to your case N/A

5. Approximate date of filing lawsuit N/A

6. Is the case still pending?

☐ Yes

☐ No (If no, give the approximate date of disposition): N/A

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

N/A

VII. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25th day of October, 2022.

Signature of Plaintiff

Dillinger S. Majors